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13 Attorneys for Plaintiff
14 RAE ELLEN LEONARD

15 * *Defendant City of Capitola's counsel listed after the caption.*

16 UNITED STATES DISTRICT COURT
17
18 NORTHERN DISTRICT OF CALIFORNIA

19 RAE ELLEN LEONARD

CASE NO. C13-3714 JST

20 Plaintiff,

21 v.

22
23 CITY OF CAPITOLA; COUNTY OF
24 SANTA CRUZ; and DOES 1-100,
25 Inclusive,

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE GENERAL
ORDER 56 DEADLINE**

26 Defendants.

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28 STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE GO 56 DEADLINE
CASE NO. C13-3714 JST

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**TO THE CLERK OF THE ABOVE-ENTITLED COURT AND TO ALL
PARTIES AND TO THEIR RESPECTIVE ATTORNEYS OF RECORD:**

STIPULATION

Plaintiff RAE ELLEN LEONARD (“Plaintiff”) and defendant CITY OF
CAPITOLA (the “City”) hereby jointly stipulate and request through their attorneys
of record that the deadline to conduct a site inspection under General Order 56 be
continued. This first request for an extension of time of the General Order 56 site
inspection deadline is based on the following good cause:

1. The parties have continued to work cooperatively in the spirit of General
Order 56 to exchange relevant information.
2. Cooperative, pre-litigation site investigations were conducted in May 2013.
3. Plaintiff provided the City with her access consultant’s report on September
26, 2013. The City is in the process of reviewing the report so that it may
respond.
4. The parties have met and conferred and are in the process of evaluating
whether a General Order 56 site inspection is necessary.
5. The parties therefore jointly stipulate and request that the Court continue the
deadline to complete a General Order 56 site inspection to January 17,
2014. This is the first joint request for a continuance of the site inspection
deadline by the parties in this case.

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2 Date: November 21, 2013

LAW OFFICE OF PAUL L. REIN

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4 By: /s/ Catherine Cabalo
CATHERINE CABALO, ESQ.
Attorneys for Plaintiff
5 RAE ELLEN LEONARD
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7 Date: November 21, 2013


LAW OFFICES OF VINCENT P. HURLEY,
8 PC

9 By: /s/ Amanda Cohen
AMANDA COHEN, ESQ.
Attorneys for Defendant
10 CITY OF CAPITOLA
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14 **ORDER**

15 Pursuant to the stipulation of the parties, and for good cause shown, IT IS SO
16 ORDERED. The deadline to complete a site inspection under General Order 56 is
17 hereby continued to January 17, 2014.
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20 Dated: November 25, 2013



HON. S. TIGAR
21 UNITED STATES DISTRICT JUDGE
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28 STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE GO 56 DEADLINE
CASE NO. C13-3714 JST

FILER'S ATTESTATION

Pursuant to General Order 45, section X(B), I hereby attest that on November 21, 2013, I, Catherine Cabalo, attorney with The Law Office of Paul L. Rein, received the concurrence of Amanda Cohen in the filing of this document.

/s/ Catherine Cabalo
Catherine Cabalo